

1 **RICHARD B. GULLEN (SBN 144513)**  
2 **ROSSI, HAMERSLOUGH, REISCHL & CHUCK**  
3 **1960 The Alameda, Suite 200**  
4 **San Jose, CA 95126-1493**  
5 **Tel: (408) 261-4252**  
6 **Fax: (408) 261-4292**  
7 **Email: rick@rhrc.net**

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Attorneys for Movants,  
XIAOTIAN SUN and WEI LUO

**Gordon J. Finwall (SBN 141777)**  
**FINWALL LAW OFFICES, APC**  
**1056 Lincoln Avenue**  
**San Jose, CA 95125**  
**Tel: (408) 350-4041**  
**Fax: (408) 350-4042**  
**Email: [Gordon@Finwalllaw.com](mailto:Gordon@Finwalllaw.com)**

Attorneys for Movants,  
CSABA MESTER and MARTA MESTER

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UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In Re:  
  
PG&E CORPORATION,  
And  
PACIFIC GAS AND ELECTRIC COMPANY,  
Debtors.  
  
Affects both Debtors.

Bankruptcy Case No. 19-30088 (DM)  
DC NO.: RG-1  
Chapter 11  
(Lead Case)  
(Jointly Administered)  
**NOTICE OF JOINT MOTION FOR  
RELIEF FROM AUTOMATIC STAY**  
Date: July 31, 2019  
Time: 9:30 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
450 Golden Gate Avenue  
Courtroom 17, 16<sup>th</sup> Floor  
San Francisco, CA 94102

XIAOTIANSUN and WEI LUO, and  
CSABA WENDEL MESTER and MARTA M.  
MESTER individually and as trustees of the  
CSABA & MARTA MESTER FAMILY  
REVOCABLE LIVING TRUST DATED  
9/1/2011 and any amendments thereto,

Movants,

VS.

1 PG&E CORPORATION, PACIFIC GAS AND  
2 ELECTRIC COMPANY, Debtors,

3 Respondents.

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5 TO: Debtors, PG&E CORPORATION and PACIFIC GAS AND ELECTRIC  
6 COMPANY, and Other Interested Parties:

7 NOTICE IS HEREBY GIVEN that on the above date and time, in the Court located at  
8 450 Golden Gate Avenue, San Francisco, CA 94102, Courtroom 17, 16th Floor, Movants  
9 XIAOTIAN SUN and WEI LUO and Movants CSABA WENDEL MESTER and MARTA M.  
10 MESTER, individually and as trustees of the CSABA & MARTA MESTER FAMILY  
11 REVOCABLE LIVING TRUST DATED 9/1/2011 and any amendments thereto, will move this  
12 Court for an Order granting relief from the automatic stay on the grounds set forth in the  
13 accompanying Motion For Relief From the Automatic Stay. The relief sought is as follows:

- 14 1. Movants XIAOTIAN SUN and WEI LUO (collectively the “SUNS”) granted relief from  
15 the automatic stay permitting the SUNS to file the proposed Second Amended  
16 Complaint, to prosecute their claims in the State Court Action to completion and/or  
17 judgment, to enforce any judgment, and to prosecute or defend any appeal.
- 18 2. Movants CSABA MESTER and MARTA MESTER, individually and as trustees of the  
19 CSABA & MARTA MESTER FAMILY REVOCABLE LIVING TRUST DATED  
20 9/1/2011 and any amendments thereto, (collectively the “MESTERS”) granted relief  
21 from the automatic stay permitting the MESTERS to prosecute their claims and defenses  
22 in the State Court Action to completion and/or judgment, to enforce any judgment, and  
23 to prosecute or defend any appeal.
- 24 3. The fourteen (14) day stay of order described by Bankruptcy Rule 4001(a)(3) is waived.  
25 Opposition, if any, shall be presented at the hearing on the motion. If opposition is  
26 presented, or if there is other good cause, the Court may continue the hearing to permit  
27 the filing of evidence and briefs.

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Rossi, Hamerslough,  
Reischl & Chuck  
1960 The Alameda  
Suite 200  
San Jose, CA  
95126-1493  
(408) 261-4252  
Fax (408) 261-4292

1 Dated: July 17, 2019

ROSSI, HAMERSLOUGH, REISCHL & CHUCK

2

3 BY: /s/ Richard B. Gullen  
4 RICHARD B. GULLEN, ESQ.  
5 Attorneys for Movants  
6 XIAOTIAN SUN and WEI LUO

7 Dated: July 17, 2019

FINWALL LAW OFFICES, APC

8

9 BY: /s/ Gordon Finwall  
10 GORDON FINWALL, ESQ.  
11 Attorneys for Movants CSABA WENDEL  
12 MESTER and MARTA M. MESTER, individually  
13 and as trustees of the CSABA & MARTA  
14 MESTER FAMILY REVOCABLE LIVING  
15 TRUST DATED 9/1/2011 and any amendments  
16 thereto

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